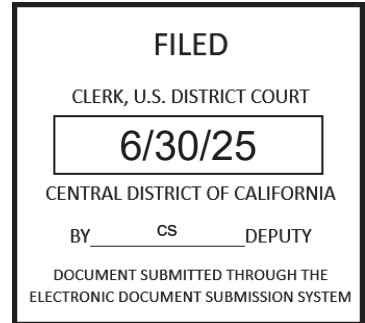


Todd R. G. Hill  
119 Vine Street  
Belton, TX 76513  
+1 [661] 899-8899  
toddryangregoryhill@gmail.com  
*In Propria Persona*



**UNITED STATES DISTRICT COURT FOR  
THE CENTRAL DISTRICT OF CALIFORNIA**

**WESTERN DIVISION**

**TODD R. G. HILL, et al,**

**Plaintiffs**

**vs.**

**THE BOARD OF DIRECTORS,  
OFFICERS AND AGENTS AND  
INDIVIDUALS OF THE PEOPLES  
COLLEGE OF LAW, et al.,**

**Defendants.**

**CIVIL ACTION NO. 2:23-cv-01298-JLS-BFM**

**The Hon. Josephine L. Staton**  
Courtroom 8A, 8th Floor

**Magistrate Judge Brianna Fuller Mircheff**  
Courtroom 780, 7th Floor

**THIRD NOTICE OF CONSTRUCTIVE  
DENIAL AND REQUEST FOR  
CLARIFICATION REGARDING  
UNRESOLVED FRE 201 JUDICIAL NOTICE  
MOTIONS**

**NO ORAL ARGUMENT REQUESTED**

**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING  
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

CASE 2:23-CV-01298-JLS-BFM

**TABLE OF CONTENTS**

I.	BACKGROUND .....	3
II.	REQUEST FOR STATUS AND CLARIFICATION .....	4
III.	PRESERVATION OF RIGHTS AND RECORD .....	5
IV.	MATERIAL FORECLOSURE OF FAIR ADJUDICATION .....	5
V.	CONCLUSION .....	5
	<b>STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1 .....</b>	<b>6</b>
	<b>Plaintiff's Proof of Service .....</b>	<b>6</b>

**Rules**

Fed. R. Civ. P. 15(a)(2) .....	4
Fed. R. Civ. P. 54(b) .....	4
Fed. R. Civ. P. 59(e) .....	3
Fed. R. Civ. P. 60(b) .....	5
FRE 201 .....	3

---

**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING  
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

CASE 2:23-CV-01298-JLS-BFM

**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION  
REGARDING UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

TO THE HONORABLE COURT AND ALL PARTIES OF RECORD:

Plaintiff Todd R. G. Hill respectfully submits this notice to identify and clarify the status of unresolved requests for judicial notice that remain pending before the Court, many of which are directly relevant to both Plaintiff's operative claims and the Fifth Amended Complaint filed on June 13, 2025 (Dkt. 310).

Plaintiff previously filed Docket 326 on June 11, 2025, titled *Second Notice of Constructive Denial and Pending Requests for Judicial Notice*, expressly identifying several of these same filings and preserving the procedural position that the omission of a ruling constitutes a constructive denial or de facto ruling, subject to appellate review and reconsideration under Fed. R. Civ. P. 59(e).

**I. BACKGROUND**

To date, no express orders resolving these requests have been issued. This current notice is submitted in good faith to reiterate those pending matters and to confirm Plaintiff's intent to preserve a complete and reviewable record.

As of the date of this filing, the following FRE 201 Requests for Judicial Notice remain pending, without express denial or docketed ruling:

- 1) Dkt. 276 – Defendant Spiro's Governance Admissions (filed 4/23/2025)
- 2) Dkt. 279 – Errata re: Dkt. 272 (filed 4/25/2025)
- 3) Dkt. 280 – Opposition to Spiro's RJN + Plaintiff's RJN re: Governance (filed 4/28/2025)
- 4) Dkt. 298 – Supplemental RJN in Support of Rule 59(e) Motion (filed 5/9/2025)

**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING  
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

CASE 2:23-CV-01298-JLS-BFM

1 5) Dkt. 301 – Qualified Opposition and Additional RJN (filed 5/11/2025)

2  
3 6) Dkt. 326 – Second Notice of Constructive Denial (filed 6/11/2025)

4  
5 7) Dkt. 329 – Judicial Admissions in Spiro’s Answer (filed 6/13/2025)

6 These filings do not seek substantive relief beyond judicial notice under FRE 201 and have  
7 been submitted in a timely and procedurally proper manner. Several of the underlying exhibits were  
8 produced by Defendants or obtained via formal CPRA requests and contain factual admissions,  
9 regulatory correspondence, and governance representations central to the asserted causes of action.  
10

11  
12 **II. REQUEST FOR STATUS AND CLARIFICATION**

13 In light of the pending Rule 15(a)(2) motion and the potential for review under Rule 54(b),  
14 Plaintiff respectfully requests clarification as to whether the Court intends to rule on the above-  
15 referenced FRE 201 motions, and whether any of them are deemed denied by implication.  
16

17 Several of these pending FRE 201 requests contain factual materials previously referenced by  
18 the Court, including those acknowledged or discussed in connection with Docket 197 and Docket  
19 199.

20 The plaintiff respectfully notes that while the Court cited portions of these submissions, such  
21 as governance admissions, CPRA-produced correspondence, and procedural irregularities, no formal  
22 ruling granting or denying judicial notice of those materials has been entered. In light of the pending  
23 Fed. R. Civ. P. 15(a)(2) motion and the potential for review under Fed. R. Civ. P. 54(b), Plaintiff  
24 respectfully requests clarification as to whether the Court intends to issue specific dispositive rulings  
25 on the above-referenced FRE 201 motions, and whether any of them are deemed denied by  
26 implication or omission.  
27  
28

---

**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING  
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

CASE 2:23-CV-01298-JLS-BFM

1                   **III.     PRESERVATION OF RIGHTS AND RECORD**

2                   For the avoidance of doubt, Plaintiff continues to preserve all appellate rights under Fed. R.  
3                   Civ. P. 59(e) and Fed. R. Civ. P. 60(b), and submits this notice solely to support an administratively  
4                   complete and procedurally transparent record.  
5

6                   **IV.     MATERIAL FORECLOSURE OF FAIR ADJUDICATION**

7                   Fair adjudication has been materially foreclosed by the Court's ongoing refusal to resolve  
8                   dispositive and, in many cases, procedurally ripe requests, or to send any signal of procedural  
9                   integrity, even when fully briefed judicial notice motions and objections have remained pending for  
10                  months and dispositive rulings have been issued (e.g., Docket 312). This pattern of selective  
11                  omission, when viewed against dispositive rulings that rely on disputed facts and unaddressed filings,  
12                  raises a substantial concern regarding procedural parity and the effective administration of justice.  
13  
14

15                  **V.     CONCLUSION**

16                  Plaintiff submits this notice in good faith to reiterate the pendency of multiple FRE 201  
17                  judicial notice requests, many of which bear directly on claims asserted in the Fifth Amended  
18                  Complaint and prior dispositive rulings. In the absence of express rulings or docketed denials, these  
19                  omissions risk undermining procedural integrity, generating avoidable appellate exposure, and  
20                  compounding the perception of selective adjudication. Plaintiff respectfully requests clarification  
21                  from the Court regarding the status of these motions and renews his preservation of all procedural  
22                  and appellate rights under Rules 59(e), 60(b), and applicable doctrines. A transparent ruling on these  
23                  requests would materially advance the interests of justice and support the orderly resolution of the  
24                  claims presented.  
25  
26  
27  
28

1 Respectfully submitted,

2  
3 Dated: June 30, 2025

4  
5   
6  
7

8 **Todd R. G. Hill**  
9 **Plaintiff, In Propria Persona**

10  
11  
12 **STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1**

13 The undersigned party certifies that this brief contains 730 words, which complies with the 7,000-  
14 word limit of L.R. 11-6.1.

15 Respectfully submitted,

16  
17   
18  
19

20 June 30, 2025  
21 Todd R.G. Hill  
22 Plaintiff, in Propria Persona

23  
24 **Plaintiff's Proof of Service**

25 This section confirms that all necessary documents will be properly served pursuant to L.R. 5-  
26 3.2.1 Service. This document will be/has been electronically filed. The electronic filing of a  
27 document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the  
28

29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100  
**THIRD NOTICE OF CONSTRUCTIVE DENIAL AND REQUEST FOR CLARIFICATION REGARDING  
UNRESOLVED FRE 201 JUDICIAL NOTICE MOTIONS**

CASE 2:23-CV-01298-JLS-BFM

1 CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court  
2 and (2) all pro se parties who have been granted leave to file documents electronically in the case  
3 pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service  
4 through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P.  
5 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal  
6 Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.  
7  
8

9  
10 Respectfully submitted,

11   
12  
13

14 June 30, 2025  
15 Todd R.G. Hill  
16 Plaintiff, in Propria Persona  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28